

1 MONTGOMERY PAEK, ESQ., Bar # 10176
2 Z. KATHRYN BRANSON, ESQ., Bar # 11540
3 LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway
Suite 300
Las Vegas, NV 89169-5937
4 Telephone: 702.862.8800
Fax No.: 702.862.8811
5 Email: mpaek@littler.com
Email: kbranson@littler.com

6 Attorneys for Defendants
7 AMERIPRISE FINANCIAL, INC. and
AMERIPRISE FINANCIAL SERVICES, INC.
8 n/k/a AMERIPRISE FINANCIAL SERVICES, LLC

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11
12 DANIELLE O'NEILL, individually,

13 Plaintiff,

14 vs.

15 AMERIPRISE FINANCIAL, INC., a
Delaware Corporation; and AMERIPRISE
16 FINANCIAL SERVICES, INC., a
Delaware Corporation,

17 Defendant.
18

Case No. 2:19-cv-02233-JAD-EJY

**STIPULATION FOR EXTENSION OF
TIME TO RESPOND TO COMPLAINT
(FIRST REQUEST)**

19 Pursuant to LR 6-1 and LR II 7-1, Plaintiff, DANIELLE O'NEILL, and Defendants,
20 AMERIPRISE FINANCIAL, INC. and AMERIPRISE FINANCIAL SERVICES, INC. n/k/a
21 AMERIPRISE FINANCIAL SERVICES, LLC, through their respective attorneys of record, hereby
22 stipulate and agree that Defendants have an additional twenty one (21) days to answer or otherwise
23 respond to Plaintiff's Complaint. Defendants were served with a copy of the Summons and
24 Complaint on January 30, 2020. Defendants' responses are currently due on February 20, 2020.
25 Good cause exists to grant this extension because Defendants require the additional time to
26 investigate and prepare their responses to the Complaint. Moreover, counsel for Plaintiff and
27 Defendants are meeting and conferring as to a potential stipulation related to the parties and claims
28

1 in the case and believe it is in the interest of judicial economy to continue these discussions prior to
2 Defendants responding to the Complaint.

3 If the requested extension is granted, Defendants will file their responses on or before March
4 12, 2020. This is the first request for an extension made by the parties and the parties make this
5 request in good faith and not for the purpose of delay.

6 IT IS SO STIPULATED.

7 Dated: February 13, 2020

Dated: February 13, 2020

8 Respectfully submitted,

9 /s/ Andre M. Lagomarsino, Esq.
10 ANDRE M. LAGOMARSINO, ESQ.
11 CORY M. FORD, ESQ.
LAGOMARSINO LAW

12 Attorney for Plaintiff
DANIELLE O'NEILL

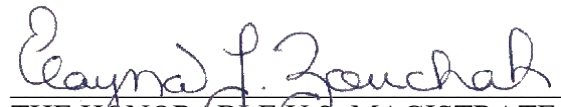


MONTGOMERY PAEK, ESQ.
Z. KATHRYN BRANSON, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Defendant
AMERIPRISE FINANCIAL, INC. and
AMERIPRISE FINANCIAL SERVICES, INC.
n/k/a AMERIPRISE FINANCIAL SERVICES,
LLC

16 IT IS SO ORDERED.

17 DATED: This 14th day of February, 2020.

18 
19 THE HONORABLE U.S. MAGISTRATE
20 JUDGE ELAYNA J. YOUCHAH

23 4823-6065-9636.1 057419.1006